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PAR: USAO 2020R00275

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2020 AUG 19 PM 1:28

UNITED STATES OF AMERICA

v.

WILLIAM FRANKLIN BROWN IV,

Defendant.

CRIMINAL NO.

CCB-20-0257

**(Production of Child Pornography, DEPUTY
18 U.S.C. § 2251(a); Possession of Child
Pornography, 18 U.S.C. §
2252A(a)(5)(B); Forfeiture, 18 U.S.C. §
2253)**

CLERK'S OFFICE
AT BALTIMORE

INDICTMENT

COUNT ONE

(Production of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On a date unknown to the Grand Jury but between in or about August 2019 and in or about January 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did employ, use, persuade, induce, entice and coerce a minor female – Jane Doe 1 – to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and said visual depiction was produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, a video that depicts Jane Doe 1's vagina, visible through underwear, being touched by a vibrator held by another individual, said video file having been stored on a Cyber Power PC, SN: ET1350-2281.

18 U.S.C. § 2251(a)

COUNT TWO

(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On a date unknown to the Grand Jury but between in or about August 2019 and in or about January 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, an image that depicts Jane Doe 1's exposed vagina in close proximity to an erect adult penis which is directly behind her, said image file having been stored on a Cyber Power PC, SN: ET1350-2281.

18 U.S.C. § 2251(a)

COUNT THREE

(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On a date unknown to the Grand Jury but between in or about August 2019 and in or about January 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, a video that depicts an adult penis being put into Jane Doe 1's mouth, said video file having been stored on a Samsung Note 9 smartphone, S/N: 803VTEY0675476.

18 U.S.C. § 2251(a)

COUNT FOUR

(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On a date unknown to the Grand Jury but between in or about August 2019 and in or about January 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, an image that depicts Jane Doe 1 penetrating her exposed vagina with a dildo, said image file having been stored on a Cyber Power PC, SN: ET1350-2281.

18 U.S.C. § 2251(a)

COUNT FIVE

(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about December 23, 2019, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, an image that depicts Jane Doe 1 nude with her legs spread and her genitals exposed and displayed in a lascivious manner, said image file having been stored on a Asus Model N580G Notebook PC, S/N: J9N0CV116577398.

18 U.S.C. § 2251(a)

COUNT SIX

(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On a date unknown to the Grand Jury but in or about August 2019 to in or about January 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, an image that depicts Jane Doe 1 holding a vibrator on her exposed vagina while being penetrated by an adult penis, said image having been stored on a Samsung Note 9 smartphone, S/N: 803VTEY0675476.

18 U.S.C. § 2251(a)

COUNT SEVEN

(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On a date unknown to the Grand Jury but between in or about March 2019 and in or about January 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

attempted to and did employ, use, persuade, induce, entice and coerce a minor female – Jane Doe 2 – to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and said visual depiction was produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, a series of 5 images, which depict the exposed vagina of Jane Doe 2, a minor female, displayed in a lascivious manner in a bathroom, said images appearing to have been made without her knowledge, said images having been stored on a Samsung Note 9 smartphone, S/N: 803VTEY0675476.

18 U.S.C. §§ 2251(a)

COUNT EIGHT

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about February 3, 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a Cyber Power PC, SN: ET1350-2281, which contained one or more visual depictions of minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256

COUNT NINE

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about February 3, 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by smartphone, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by smartphone, that is, the defendant possessed a Samsung Note 9 smartphone, S/N: 803VTEY0675476, which contained one or more visual depictions of minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256

COUNT TEN

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about February 3, 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a Asus Model N580G Notebook PC, S/N: J9N0CV116577398, which contained one or more visual depictions of minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256

COUNT ELEVEN

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about February 3, 2020, in the District of Maryland, the defendant,

WILLIAM FRANKLIN BROWN IV,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a SanDisk Cruzer Hard Drive, S/N: 4C531001570512117250, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. The allegations of Counts One through Eleven of this Indictment are incorporated here.
2. As a result of the offenses set forth in Counts One through Eleven of the Indictment in this case, the defendant,

WILLIAM FRANKLIN BROWN IV,

shall forfeit to the United States all property that was used and intended to be used to commit and to promote the commission of offenses in Counts One through Eleven, and any property traceable to such property, including but not limited to the following:

- a. A Cyber Power PC, SN: ET1350-2281;
- b. A Samsung Note 9 smartphone, S/N: 803VTEY0675476;
- c. An Asus Model N580G Notebook PC, S/N: J9N0CV116577398; and
- d. A SanDisk Cruzer Hard Drive, S/N: 4C531001570512117250.

18 U.S.C. § 2253

Robert K. Hur/par
Robert K. Hur
United States Attorney

A TRUE BILL

SIGNATURE REDACTED

Foreperson

Date: August 19, 2020